

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION

WILLOW BRIDGE PROPERTY  
COMPANY LLC,

*Plaintiff,*

v.

ARCH SPECIALTY INSURANCE  
COMPANY,

*Defendant.*

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Civil Action No. 3:24-cv-00029-D

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PLAINTIFF’S RESPONSE TO DEFENDANT’S MOTION FOR  
SUMMARY JUDGMENT

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TO THE HONORABLE JUDGE OF SAID COURT:

Plaintiff Willow Bridge Property Company LLC (formerly LPC Multifamily Holdco LLC d/b/a Lincoln Property Company) (“LPC”) files this Response to Defendant Arch Specialty Insurance Company’s (“Arch”) Motion for Summary Judgment (the “Motion”) (ECF 36 & 37).

For the reasons set forth in the Brief in Support, which is fully incorporated herein, LPC respectfully requests that the Court deny Arch’s Motion.

WHEREFORE, PREMISES CONSIDERED, Plaintiff Willow Bridge Property Company LLC respectfully requests that the Court take notice of this Response and Brief in Support, that the Court deny the relief sought by the Motion, and that such other and further relief be granted as LPC may show itself justly or equitably entitled.

Dated: September 20, 2024

Respectfully submitted,

/s/ Julie Hammerman [9/20/2024]

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### **CERTIFICATE OF SERVICE**

I, Julie Hammerman, certify that on September 20, 2024, I served a true and correct copy of the foregoing document via electronic service on:

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/s/ Julie Hammerman [9/20/2024]

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